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May 4, 2022

BY ECF

Hon. Kimba M. Wood
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

USDC SDNY
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Re: *Mary Tardif v. City of New York, et al.*, 13-cv-4056 (KMW)(KNF)

Dear Judge Wood:

MEMO ENDORSED

Plaintiff respectfully requests an extension to submit the supplemental affidavits of neurologist R.C. Krishna, M.D. and neuroradiologist Gregory J. Lawler, M.D., which are currently due today. (ECF No. 431). Plaintiff requests that these two supplemental affidavits be filed on or before 10:00 a.m. on May 9, 2022, and, if granted, an extension for Defendant to submit its response, if any. Defendant does not consent to this request.

Granted
in part.
KMW

Today, per the Court's Order, Plaintiff will be submitting the supplemental affidavits of economist Mark P. Zaporowski and life care planner Linda Lajterman.

Dr. Krishna and Dr. Lawler are both treating physicians who have been seeing patients in their practices since the Court issued the directive for them to submit their supplemental affidavits. (In Dr. Lawler's case, reviewing images). Given the schedules and commitments of their respective practices, they have had limited opportunity to write their affidavits, and they were both hoping to complete the affidavits over this past weekend. Unfortunately, they were not able to do so. They attempted to finish the affidavits on Monday and Tuesday to comply with this Court's deadline, but their attempts have been unsuccessful, given their work schedules.

The requested extension would give both physicians the opportunity to complete their affidavits over the weekend when the demands of their medical practices are less.

Plaintiff must submit Lawler's and Krishna's affidavits by 5 p.m. on May 6, 2022. Defendant's response as to all four affidavits is due by 5 p.m. on May 13, 2022.

cc: All Counsel of Record (via ECF)

Respectfully,

/s/Reza Rezvani

Reza Rezvani

SO ORDERED, N.Y., N.Y. 5/4/22

Kimba M. Wood
KIMBA M. WOOD
U.S.D.J.